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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, *et al.*, individually and  
on behalf of all similarly situated,  
  
Plaintiffs,  
  
v.  
  
GOOGLE LLC,  
  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING  
JOINT SUBMISSION IN RESPONSE TO  
DKT. 331, 332 RE: SEALING PORTIONS  
OF NOVEMBER 12, 2021 ORDER RE:  
SPECIAL MASTER’S REPORT AND  
ORDERS ON REFERRED DISCOVERY  
ISSUES**

**[PROPOSED] ORDER**

Before the Court is the Parties' Joint Submission in Response to Dkt. 331, 332 re: Sealing Portions of November 12, 2021 Order Adopting in Part and Modifying in Part the Special Master's Report and Orders on Referred Discovery Issues ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Portions to be Filed Under Seal	Basis for Sealing Portion of Document
November 12, 2021 Order	GRANTED as to redacted portions at:  4:9; 4:13; 4:15	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal identifiers, systems, projects, data structures, and operations that Google does not share publicly, including particular internal data sources Google was ordered to search for data relating to Plaintiffs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.
Exhibit 1 (Brown) to November 12, 2021 Order	GRANTED as to redacted portions at:  Paragraphs 3.1-3.7	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal identifiers, systems, projects, data structures, and operations that Google does not share publicly, including particular internal data sources Google was ordered to search for data relating to Plaintiffs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. SUSAN VAN KEULEN  
United States Magistrate Judge